

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

MARIA ROBINSON

§

Plaintiff,

§

v.

Civil Action No. 4:20-cv-03760

ETHICON INC., et al

§

Defendants.

§

**JOINT MOTION TO SET TRIAL DATE, AND EXTEND CERTAIN
PRETRIAL DEADLINES AND DOCKET CALL**

Plaintiff Maria Robinson and Defendants Ethicon, Inc. and Johnson & Johnson (“the Partier”) hereby submit this joint motion to set a trial date, and extend certain pre-trial deadlines and docket call, and would respectfully show as follows:

The deadline for the Parties to submit their Joint Pretrial Order is currently May 9, 2022. Dkt. 168. After conferring with the Court’s Case Manager, the parties understand, however, that it is not possible for this case to be tried in June. Because counsel for the Parties have conflicting trial dates in the summer and early fall of 2022, the parties respectfully request that (1) the trial of this matter be set the last week of October 2022, (2) the current May 27 docket call setting be vacated and rescheduled to September 30, and (3) the Court extend the deadline for filing the Joint Pretrial Order and related objections to dates closer to the new trial date, as follows:

- September 12, 2022: File Joint Pretrial Order
- September 26, 2022: Deadline to file any objections to exhibits, witnesses and deposition designations.

The Parties further request a date certain for this trial. Due to the number of expert and fact witnesses to be called to testify live, and the expected length of trial, having a specific trial date is necessary. Many anticipated live witnesses are practicing physicians and would suffer a hardship when forced to alter their patient schedule if a trial date is not known until September 30. Further, with a specific trial date, the parties can better plan their case, leading to a shorter and more efficient trial. For these reasons, the Parties request that this case be set for trial on October 24, 2022.

Respectfully submitted this 20th day of April, 2022.

/s/ Laura J. Baughman

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CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of April, 2022, the foregoing was filed with the Clerk of the Court using the Court's CM/ECF system which will send notification of such filing to all registered ECF participants.

SO CERTIFIED, this the 20th day of April, 2022.

/s/ Laura J. Baughman

Laura J. Baughman